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FILED  
DISTRICT COURT OF GUAM

FEB -2 2005 mba

MARY L.M. MORAN  
CLERK OF COURT

(P)

8 IN THE UNITED STATES DISTRICT COURT

9 FOR THE TERRITORY OF GUAM

10 UNITED STATES OF AMERICA, ) CRIMINAL CASE NO. 05-00005  
11 ) Plaintiff. )  
12 ) )  
13 ) vs. )  
14 ) )  
15 ) YU MAN YEN, aka KEE SAN )  
16 ) JOFFRE CHEN, aka TAI FAT LEE, )  
17 ) THIN LOO YAT, aka LEE THIN )  
FOOK, and JAE HEE KIM, aka )  
YONG KIM, )  
18 ) Defendants. )

INDICTMENT  
POSSESSION OF FIFTEEN OR MORE  
COUNTERFEIT OR UNAUTHORIZED  
ACCESS DEVICES

[18 U.S.C. §§ 1029(a)(3) and 2]

20 THE GRAND JURY CHARGES:

21 On or about January 25, 2005, in the District of Guam, the defendants herein, YU MAN  
22 YEN aka KEE SANG JOFFRE CHEN, aka TAI FAT LEE, THIN LOO YAT, aka LEE THIN  
23 FOOK, and JAE HEE KIM, aka YONG KIM, each aided and abetted one by the other, did  
24 knowingly and with intent to defraud, possess fifteen or more counterfeit and unauthorized  
25 access devices, to-wit:

26 (1) EON Bank Visa, #4802-1324-6118-4684  
27 (2) MBF Visa, #4901-0703-7618-5026

ORIGINAL

1 (3) Citibank Visa, #4508-7315-0003-9275  
2 (4) Citibank Visa, #4570-0271-4670-2514  
3 (5) Citibank Visa, #4571-3740-2022-9829  
4 (6) Citibank Visa, #4929-4045-4901-9002  
5 (7) Hong Leong Bank Visa, #4547-1820-3002-5777  
6 (8) Hong Leong Bank Visa, #4541-8220-2004-2763  
7 (9) Hong Leong Bank Visa, #4520-8380-0070-7964  
8 (10) Hong Leong Bank Visa, #4547-1305-0085-3616  
9 (11) Southern Bank Berhad Visa, #4901-1791-0426-4878  
10 (12) Southern Bank Berhad Visa, #4920-89-0449-7213  
11 (13) DBS Bank Visa, #4567-1993-5814-7400  
12 (14) DBS Bank Visa, #4940-5252-7311-0925  
13 (15) DBS Bank Visa, #4940-1302-5026-8802  
14 (16) Citibank Mastercard, #5250-1175-4819-8009  
15 (17) Citibank Mastercard, #5275-0020-0611-4931  
16 (18) Citibank Mastercard, #5402-3681-0979-4010  
17 (19) DBS Bank Mastercard, #5543-9740-0483-3413  
18 (20) DBS Bank Mastercard, #5460-9758-0063-3237  
19 (21) Hong Leong Bank Mastercard, #5548-2725-7023-6870  
20 (22) Hong Leong Bank Visa, #4525-7314-1000-4467  
21 (23) Hong Leong Bank Visa, #4311-9510-0757-5764  
22 (24) Citibank Mastercard, #5301-2130-1876-7016  
23 (25) Hong Leong Bank Mastercard, #5434-6010-1972-2537  
24 (26) DBS Bank Mastercard, #5434-7784-0003-1577  
25 (27) HSBC Visa, #4534-5018-2701-7009  
26 (28) Affin Bank Visa, #4695-5400-0005-4368  
27 (29) Citibank Mastercard, #5418-9152-8917-1005  
28

1 (30) JCB International JCB, #3562-1503-0000-4626

2

3 (31) Hong Leong Bank Visa #4508-9888-2057-2050

4 (32) MBF Cards Visa, #4974-0770-0689-3624

5 (33) MBF Cards Visa, #4986-9512-1290-6105

6 (34) MFB Cards Visa, #4980-0394-3321-8132

7 (35) DBS Bank Visa, #4946-5502-1411-2321

8 (36) DBS Bank Visa, #4974-0173-3042-7566

9 (37) DBS Bank Visa, #4980-0356-6305-6143

10 (38) United Overseas Bank Visa, #4019-0140-0060-5743

11 (39) Hong Leong Bank Visa, #4541-1427-8138-7012

12 (40) Affin Bank Visa, #4009-1226-5361-4011

13 (41) DBS Bank Visa, #4129-8506-7474-0812

14 (42) DBS Bank Visa, #4901-1551-2300-2119

15 (43) Southern Bank Berhad Visa, #4923-8404-2014-5018

16 (44) Southern Bank Berhad Visa, #4918-8900-0232-1419

17 (45) Southern Bank Berhad Visa, #4921-8197-2017-3138

18 (46) Southern Bank Berhad Visa, #4925-2075-4616-5940

19 (47) Citibank Visa, #4009-4122-6261-0017

20 (48) Citibank Visa, #4060-0106-5175-4010

21 (49) Citibank Visa, #4564-7170-2009-2739

22 (50) Citibank Visa, #4809-3013-2357-0017

23 (51) EON Bank Visa, #4072-2090-2060-7661

24 (52) EON Bank Visa, #4049-7080-0127-4565

25 (53) EON Bank Visa, #4029-8862-0089-1001

26 (54) EON Bank Visa, #4402-8887-1553-2010

27 (55) EON Bank Visa, #4025-8101-0388-7001

28

1 (56) EON Bank Visa, #4270-3000-1002-9279  
2 (57) Standard Chartered Mastercard, #5546-3791-4567-1002  
3 (58) HSBC Mastercard, #5413-3040-3772-6292  
4 (59) EON Bank Mastercard, #5187-1000-0290-7501  
5 (60) Maybank Mastercard, #5187-1000-0028-8490  
6 (61) Hong Leong Bank Mastercard, #5434-5801-2691-3082  
7 (62) Hong Leong Bank Mastercard, #5232-5335-0531-2230  
8 (63) Citibank Mastercard, #5353-1613-0437-4830  
9 (64) Citibank Mastercard, #5400-1200-0085-2237  
10 (65) Citibank Mastercard, #5402-7532-1003-1487  
11 (66) Citibank Mastercard, #5410-2852-0102-1771  
12 (67) Citibank Mastercard, #5279-4734-4953-7093  
13 (68) Citibank Mastercard, #5413-3027-3121-6370  
14 (69) Citibank Mastercard, #5255-0210-4818-6644  
15 (70) DBS Bank Mastercard, #5413-8680-1981-8962  
16 (71) DBS Bank Mastercard, #5491-0482-2063-0630  
17 (72) DBS Bank Mastercard, #5250-0248-2747-9011  
18 (73) DBS Bank Mastercard, #5468-0131-2947-1014  
19 (74) DBS Bank Mastercard, #5221-7500-4005-9299  
20 (75) DBS Bank Mastercard, #5462-5871-6014-3448  
21 (76) DBS Bank Mastercard, #5505-6650-6074-1047  
22 (77) Citibank Visa, #4164-9301-5068-1858  
23 (78) Hong Leong Bank Visa, #4006-6760-1481-9901  
24 (79) Citibank Mastercard, #5400-4221-2036-9260  
25 (80) MBF Finance Mastercard, #4135-9300-0049-8327  
26 (81) United Overseas Bank Visa, #4544-1620-0177-6403  
27 (82) Citibank Visa, #4929-4285-0873-6009  
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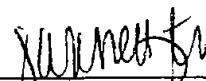
1 (83) EON Bank Mastercard, #5435-5671-1166-0025  
2 (84) Hong Leong Bank Mastercard, #5460-9658-0008-2709  
3 (85) HSBC Mastercard, #5417-1117-2290-0371  
4 (86) HSBC Mastercard, #5547-6102-1184-0876  
5 (87) Citibank Mastercard, #5400-4209-3003-2623  
6 (88) Citibank Mastercard, #5353-1790-0185-2726  
7 (89) Citibank Mastercard, #5299-3088-7683-4132  
8 (90) Citibank Mastercard, #5266-1400-0024-9898  
9 (91) Cibibank Mastercard, #5402-0700-1122-7226  
10 (92) Citibank Mastercard, #5232-9209-5003-9923  
11 (93) DBS Bank Mastercard, #5434-8012-0017-4239  
12 (94) DBS Bank Mastercard, #5419-8224-0018-4595  
13 (95) DBS Bank Mastercard, #5226-6000-7405-1610  
14 (96) DBS Bank Mastercard, #5497-0129-0200-0219  
15 (97) DBS Bank Mastercard, #5187-1800-0083-6563  
16 (98) DBS Bank Mastercard, #5434-6896-0045-9015  
17 (99) DBS Bank Mastercard, #5520-3352-0001-6376  
18 (100) DBS Bank Mastercard, #5435-5690-0017-5552  
19 (101) DBS Bank Visa, #4434-3200-0013-0476  
20 (102) EON Bank Visa, #4367-4500-0000-9742  
21 (103) Maybank Visa, #4272-0820-5783-8014  
22 (104) Maybank Visa, #4294-8002-8321-1027  
23 (105) Maybank Visa, #4129-8507-6496-1583  
24 (106) MBF Cards Visa, #4462-6701-0124-8279  
25 (107) MBF Cards Visa, #4405-0302-1189-7251  
26 (108) MBF Cards Visa, #4402-6028-1068-7904  
27 (109) MBF Cards Visa, #4404-3720-1116-5690  
28

1 (110) Citibank Visa, #4390-8830-0013-6639  
2 (111) Citibank Visa, #4538-5130-3686-6924  
3 (112) Citibank Visa, #4333-4740-3365-0018  
4 (113) Citibank Visa, #4541-8260-3000-5413  
5 (114) Citibank Visa, #4541-1534-2527-2015  
6 (115) Citibank Visa, #4493-5370-4007-3873  
7 (116) Citibank Visa, #4263-9348-4211-8200  
8 (117) Citibank Visa, #4539-7204-8198-7027  
9 (118) Citibank Visa, #4508-2624-1000-3219  
10 (119) Citibank Visa, #4541-2073-1826-4008  
11 (120) HSBC Mastercard, #5480-4100-1230-4068  
12 (121) Citibank Visa, #4907-2437-0892-4107

13 in or affecting interstate or foreign commerce, in violation of Title 18, United States Code,  
14 Sections 1029(a)(3) and 2.

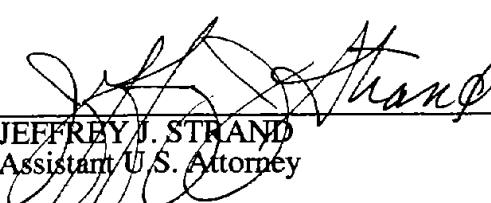
15 DATED this 2 day of February, 2005.

16 A TRUE BILL.

17   
18 Foreperson

19  
20 LEONARD M. RAPADAS  
United States Attorney  
21 Districts of Guam and NMI

22 By: Ernest A. Blank for R.S.  
23 RUSSELL C. STODDARD  
24 First Assistant U.S. Attorney

25   
26 JEFFREY J. STRAND  
27 Assistant U.S. Attorney